Comments

E-0043/040, EM-0217/040, EM-0218/040, L-0056/040, LM-0017/040, LM-0018/040

GAP agrees with the Hanford Advisory Board's advice that DOE should consider a cost method whereby the generators of the imported waste pay the cost of treatment and disposal of their waste. If the costs are covered by money designated for Hanford cleanup, then the cleanup necessarily will suffer and might not meet the Tri-Party Agreement milestones or other compliance requirements.

E-0043/069, EM-0217/069, EM-0218/069, L-0056/069, LM-0017/069, LM-0018/069

The EIS should include accurate, full life-cycle costs of storage and disposal.

Hanford funds should not be used to pay for or subsidize the treatment or disposal from other sites.

E-0055/026

We repeat our prior comments and the Advisory Board's advice that the HSW-EIS consider the impacts on Hanford Cleanup from the costs of offsite waste (see consensus advice #79, #84, and #94). Charging generators the long-term, fully burdened costs of disposal (and treatment or storage), as the Board has advised (see consensus advise # 98), would encourage treatment and reduction in waste volumes. It would also reduce the impact of offsite waste on the ability of the Hanford site to meet TPA milestones and other compliance requirements. This costing method must be considered in the HSW-EIS.

TPO-0008/005

What are the estimated overall costs? And are these costs summarized as to short term, long term, or continuous?

TPO-0013/007

And how much will it [additional waste import] cost?

TRI-0001/008

The issue of importing waste also has a related impact that needs to be considered of how it affects Hanford cleanup funding. The Department of Energy's own study last summer found that off-site generators pay less than 50 percent of the cost of disposal of waste.

When we begin talking about building new facilities and we begin talking about increasing the waste imported, we are talking about a dramatic increase in the subsidy of our Hanford cleanup dollars at a time when DOE continues to say it cannot afford to do all the things that regulators and the public wish it to do, like cleaning up groundwater along the Columbia River, or continuing to remediate the N-Area cribs near the Columbia River, or installing all the legally required groundwater monitoring around these burial grounds.

We are talking about a pretty significant impact on Hanford cleanup. And one of the things that is clear under NEPA, you must consider the alternative of charging the generator the fully burdened long-term cost of disposal, because it has shown repeatedly that charging the generator the full cost will decrease the amount of waste. It also dramatically changes the equation of whether or not we minimize waste and treat waste before disposal.

This document unfortunately implements a decision from the Waste Management EIS to use minimal treatment before disposal, and minimal minimization of waste volumes. That would change dramatically if we charged the generators the fully burdened long-term cost of disposal. And that is a dramatic environmental impact. And it needs to be considered in this EIS. And I would also say it violates the Secretary of Energy's commitment made to Congress last summer in writing that said that all future disposal decisions will consider and discuss the fully burdened long-term costs of disposal before they are made. That needs to be in this EIS and clearly stated.

Cost

Then what are we talking about here? Hanford's cost of disposal, using '99 figures, was $29.63 a foot. The rate charged was $14 a cubic foot. And that does not include the long-term costs. For instance, capping, groundwater monitoring. Of course the land is being treated as if it's free. We need to move to a system where if waste is imported, I am not advocating that it should be, but that the generators charge the fully burdened long-term cost, and that this is a reasonable alternative that has to be considered in this EIS. We have said that last year, and we are shocked, surprised because it is a legal requirement, to find that it is not in here this year.

Response

Charging DOE waste generators higher disposal costs is not expected to reduce the amount of waste generated by DOE sites or to increase the amount of waste reduction already occurring under the DOE pollution prevention and waste minimization program. The Pollution Prevention Act, Section 6002 of RCRA and several executive orders were enacted, in part, because it was recognized that (1) government organizations should make efforts to minimize the amount of waste they generate and (2) economic incentives generally do not work for government entities. For waste being disposed of at Hanford, the waste generator and the disposal facility are both part of the same government organization, the DOE. Although private companies can collect money today for work to be performed in later years, government organizations like DOE are precluded from collecting money to cover future costs (such as closure costs and long-term monitoring costs) without specific congressional approval.

The recent "Report to Congress - The Cost of Waste Disposal: Life Cycle Cost Analysis of Disposal of Department of Energy Low-Level Radioactive Waste at Federal and Commercial Facilities" (DOE 2002d) explains that waste disposal decisions should be made based on the total life-cycle cost of waste disposal. These decisions need to consider the costs for treatment, inspection and verification, disposal, closure, and long-term monitoring. The DOE pollution prevention and waste minimization program already requires waste disposal decisions to be made based on life-cycle costs and other factors. See Volume I Section 2.2.5 for a discussion of the DOE pollution prevention/waste minimization program.

The cost estimates for the alternative groups evaluated in the HSW EIS are for continued operation of existing facilities, the modification of existing facilities, construction of new facilities, and operation of the new or modified facilities. Costs for certain operations extending beyond 2046, such as capping the LLBG disposal units and treatment of leachate from mixed waste trenches, are also reflected in the estimates. Costs of alternatives are discussed in Volume I Section 3.6, and are summarized in Volume I Table 3.21. Cost estimates are for life-cycle activities and are in constant 2002 dollars. No costs are discounted. Details of the cost estimates are presented in Appendix C of the Hanford Site Solid Waste Management Environmental Impact Statement Technical Information Document (FH 2003). Costs include post-closure activities, such as monitoring during the institutional control period.

Comments

L-0044/087

Sec. 1.4.2, p.1.13 The discussion of the Cost Report should indicate who should consider life-cycle costs (lines 38-40) and indicate how this EIS relates to such “consideration”.

Response

Volume I Section 1.4.2 has been revised to indicate DOE is the organization who considers life cycle costs. DOE may use life cycle costs in addition to environmental and other factors to make decisions.

Comments

L-0044/052

Vol. I, Sec. 3.6, pp. 3.58-59, Table 3.21 Ecology's August 21, 2002 comments (numbered 8, 102, 103, 104, 105, 106, and 177) identified the omission of addressing groundwater monitoring requirements, including monitoring well installation and monitoring costs. Specifically, Ecology's comment indicated the omissions rendered the impact and cost evaluations "1) nonbounding and incomplete and 2) do not allow the reader to understand that the groundwater quality impact analysis is not supported by adequate LLBG-specific data."

L-0044/054

Vol. I, Sec. 3.6, pp. 3.58-59, Table 3.21 Ecology's August 21, 2002 comments (numbered 8, 102, 103, 104, 105, 106, and 177) identified the omission of addressing groundwater monitoring requirements, including monitoring well installation and monitoring costs. Specifically, Ecology's comment indicated the omissions rendered the impact and cost evaluations "1) nonbounding and incomplete and 2) do not allow the reader to understand that the groundwater quality impact analysis is not supported by adequate LLBG-specific data."

L-0044/056

The EIS does not appear to include groundwater monitoring for the LLBGs in the comparison of costs of alternatives (see Sec. 3.6). Washington Administrative Code (WAC) 173-303-645 requires groundwater monitoring at RCRA land-based TSDs. Even though only portions of the LLBGs will be permitted to operate under final facility standards, the majority of the LLBGs will be subject to land-based RCRA TSD closure standards which will include groundwater monitoring requirements of WAC 173-303-645.

L-0044/074

2.2.7, pp. 2.40-41 There is no indication of which of the "specific measures that long-term stewardship can include" will be assumed to be applied when decisions are made under this EIS, or which are included in the cost estimated in Table 3.21.

Response

The HSW EIS has been prepared to meet NEPA environmental review requirements and to support DOE decisions about its solid waste management activities at Hanford. The alternatives evaluated in the HSW EIS have been formulated based on an underlying purpose and need for agency action, consideration of the WM PEIS and its records of decision, and comments received during the EIS scoping process and during other opportunities for public comment. The HSW EIS expressly recognizes that other statutes, regulatory programs, permits, compliance agreements, and other specific requirements will apply to implementation of any alternative group. Groundwater protection and management through the operational and post-closure periods will be addressed through the application of requirements under the TPA and the Hanford Sitewide Dangerous Waste permit. See Volume I Section 6.

The cost estimates for the alternative groups evaluated in the HSW EIS are for continued operation of existing facilities, the modification of existing facilities, construction of new facilities, and operation of the new or modified facilities. Costs for certain operations extending beyond 2046, such as capping the LLBG disposal units and treatment of leachate from mixed waste trenches, are also reflected in the estimates. Costs of alternatives are discussed in Volume I Section 3.6, and are summarized in Volume I Table 3.21. Cost estimates are for life-cycle activities and are in constant 2002 dollars. No costs are discounted. Details of the cost estimates are presented in Appendix C of the Hanford Site Solid Waste Management Environmental Impact Statement Technical Information Document (FH 2003). Costs include post-closure activities, such as monitoring during the institutional control period.

All HSW EIS alternative groups include a $75 million estimated amount for post operational monitoring based on a minimum cost of $500,000 per year for a 100-year active institutional control period (DOE 2002d), and a maximum estimated cost of $750,000 per year depending on number of wells and monitoring requirements. See Volume I Section 3.6 Table 3.21.